

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-against-

MICHAEL UVINO etal,

Defendant.

21 CR. 466 (S1) (HG)

**NOTICE OF MOTION TO
SURPRESS**

COUNSEL:

PLEASE TAKE NOTICE that, upon the accompanying declaration of Jeremy M. Iandolo, sworn on November 14, 2022 and the accompanying memorandum of law dated November 7, 2022 and all the prior proceedings, defendant Michael Uvino (Uvino) will move this Court, as a date and time to be set by the Court for an order:

1. Pursuant to Federal Rules of Criminal Procedure Rule 12(b)(3)(C), suppressing all ill-gotten evidence, which was initially procured via unlawful wiretap communications, as well as any and all evidence which was unlawfully gained thereafter and deemed fruit of the poisonous tree.
2. Granting defendant Uvino leave to join in the motion of co-defendants to the extent that they are applicable to him; and
3. Granting Uvino such other and further relief as this court deem just and proper.

Dated: Brooklyn New York
November 14, 2022

By: s/ Jeremy M. Iandolo